

**From:** Larry Champagne  
**To:** Shewmake, Kenneth  
**CC:** Chip\_Wood@fws.gov; Clare\_Lee@fws.gov; Mobley, Tommy; Pitts Don; Sei...  
**Date:** 2/22/2012 8:45 AM  
**Subject:** Star Lake FS Work Plan

Kenneth:

The Natural Resource Trustees and I have completed our review of this work plan and have the comments below. Although most of these comments are somewhat included in your list of requirements, additional detail is provided here.

1. Other NPL sites (e.g., Gulfco) have recognized the Texas Risk Reduction Program Rule (30 TAC Chapter 350) and the Texas Surface Water Quality Standards (30 TAC Chapter 307) as ARARs. These state-adopted rules should be added to the list of ARARs for this site.
2. The identification of the primary and secondary risk drivers by sample location is unnecessary as it has been agreed that these Category 3 and 4 locations would be evaluated under scenarios 10b and 11b to one-half the benchmark initial effects levels. Even if a COPEC could be individually reduced to a concentration that would result in a lower ERM/PEL-Q Category ranking, numerical PRGs have not been developed and the impacts to the environment to achieve that concentration have not yet been considered. In addition, most of the COPECs at the site occur in classes (e.g., PAHs, PCBs, chlorinated pesticides) that demonstrate the same toxic effect mechanism. As such, impacts from all COPECs in a class would need to be evaluated.
3. The purpose of the sensitivity analyses was to see if risk locations could be grouped with polygons. A figure depicting these polygons is needed.
4. The work plan is inconsistent in its identification of COPECs. For instance, in Section 2.1.2.1, many of the previously identified COPECs are not included, specifically those metals other than arsenic and vanadium as well as the pesticides, some of which have been identified as the primary drivers. Also, in Section 2.3.1.2, it is stated that "COPECs that appear to be driving this potential risk in the Molasses Bayou upstream watercourse are 4'4'-DDT, lead, mercury, Dieldrin, PAHs, and gamma-BHC." These COPECs are not discussed elsewhere in the document and are not consistent with Section 2.1.2.1.
5. Section 2.3.1.2 also discusses how many sample locations had concentrations exceeding the second effects level benchmark for total PAHs; however, scenarios 10b and 11b are supposed to be an evaluation of one-half 1st effects benchmarks.
6. A figure is needed that depicts the sample locations that would be addressed through scenarios 10b and 11b.

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Please let me know if you have any questions.

Larry

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>>> Kenneth Shewmake <[Shewmake.Kenneth@epamail.epa.gov](mailto:Shewmake.Kenneth@epamail.epa.gov)> 2/17/2012 5:01 PM

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Larry,

We just had a meeting on Star Lake. We are not going to accept the FS work plan, and we are going to send out a letter with specific comments describing what we expect in the FS, along with a schedule that shows completion of the final FS by May 15. I was told to make my comments into a list of specific requirements that we are going to send with the letter.

I will have this done by Wednesday. I will send a copy to you as soon as it is ready. Some of the main issues include the following.

RAOs and PRGs should be based on levels described in scenario 10B.  
WP shows AOIs not polygons, we recommend using groups of polygons.  
We want more information on the method used to evaluate remedial alternatives.

Approach described where 2 constituents are remediated and the ERM, PEL-Q score is recalculated is not acceptable.

We want more specific information on the results of the RI and sensitivity analysis in FS report.

Some missing figures will need to be in the FS.

Better description of the results of the HH risk assessment.

Provide specific ARAR values.

Better description of source areas.

List of constituents is incomplete

Want a full description of bioavailability and other factors used to eliminate COPECs during sensitivity analysis.

Better language when describing HH cancer risk range.

Discuss groundwater in FS.

If you have issues that you want addressed, send them to me and I will try to incorporate them. You could also produce your own letter for the PRP. I'm sorry about the lack of communication and asking for comments that will not be used in the normal manor.

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